



January 10, 2020

Department of Toxic Substances Control (DTSC)  
Attention: Safer Consumer Products Program

**RE: TREATMENTS CONTAINING PERFLUOROALKYL OR POLYFLUOROALKYL  
SUBSTANCES (PFAS) FOR USE ON CONVERTED TEXTILES OR LEATHERS**

Dear Safer Consumer Products Staff:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comments in support of the DTSC proposal to list treatments containing any member of the class of PFAS for use on converted textiles or leathers as a Priority Product. CASA is an association of local agencies engaged in advancing the recycling of wastewater into usable water, as well as the generation and beneficial reuse of renewable energy, biosolids, and other valuable resources. Through these efforts, we help create a clean and sustainable environment for Californians.

Public wastewater treatment plants are passive recipients of harmful chemicals contained in an array of consumer products that are washed down indoor drains or flushed down toilets. Therefore, source control and other upstream actions to stop the flow of these chemicals at their source are important to support the wastewater sectors mission of protecting public health and the environment. The DTSC proposal to include PFAS used in industrial processes as a Priority Product is a pragmatic source control measure.

CASA is therefore writing to express its strong support for the DTSC's proposal to list treatments containing any member of the class of PFAS for use on carpets and other textiles as a Priority Product. Many of these products have a pathway to public sewer systems – in particular, anything applied to carpeting. Since the liquid waste stream generated from residential and commercial carpet cleaning is almost always directed to public wastewater systems, these treatments are an important line of products from which to remove PFAS. Beyond that, any of these products applied to furniture or other surfaces that come in contact with clothing can transfer PFAS to the wastewater stream during laundering.

Wastewater treatment plants which provide essential public services are “receivers” of these chemicals used by manufacturers such as in the textile industry and merely convey and/or manage the traces of PFAS coming into our systems daily. CASA strongly agrees with the source control measures as proposed by DTSC rather than imposing unnecessary and costly limits on the wastewater and other receiver sectors. In order to address the true sources of these chemicals, it is imperative to discontinue and phase out production and use (both domestic and foreign) at manufacturing facilities and find safer alternatives for textiles, carpets, clothing and other consumer products. As long as PFAS are elements of products used in our everyday lives, and background levels resulting from decades of manufacturing and use persist, these chemicals will continue to be found in “receiver” streams. These chemicals should be regulated at their source, where it's more cost-effective to take a pollution prevention approach.

CASA is pleased to offer its strongest support for the DTSC proposal as a pragmatic source control measure. Thank you for your leadership on this important issue. Please feel free to contact Greg Kester of my staff with any questions. He can be reached at [gkester@casaweb.org](mailto:gkester@casaweb.org) or at 916-844-5262.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam D. Link". The signature is fluid and cursive, with the first name "Adam" being more legible than the last name "Link".

Adam D. Link  
Executive Director